

1
2
3
4
5 THE HONORABLE ROBERT S. LASNIK
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

THUYHONG NGUYEN, an individual,

Plaintiff,

v.

CENTURYLINK, INC., a Louisiana corporation,

Defendant.

NO. 2:17-cv-01341-RSL

JOINT STIPULATED MOTION
FOR RELIEF FROM DEADLINE
FOR INITIAL DISCLOSURES AND
JOINT STATUS REPORT AND
DISCOVERY PLAN

NOTE ON MOTION CALENDAR:
October 23, 2017.

The parties to this action, Plaintiff Thuy Nguyen and Defendant Centurylink, Inc. jointly and respectfully request that this Court modify its Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement, Dkt. # 9. Good cause exists for relief from the deadline for initial disclosures and the combined joint status report and discovery plan. The parties request that the Court enter an order requiring initial disclosures to be exchanged pursuant to FRCP 26(a)(1) on November 16, 2017 and that the parties file the joint status report and discovery plan on November 16, 2017.

The parties request that the Court extend the two deadlines as the extension will ensure that the parties are able to incorporate Defendant's answer and affirmative defenses into the initial disclosures and joint status report and discovery plan. The Defendant in this case waived service of the summons and complaint and instead, accepted service pursuant to FRCP 4.

JOINT STIPULATED MOTION FOR RELIEF FROM DEADLINE FOR
INITIAL DISCLOSURES AND JOINT STATUS REPORT AND
DISCOVERY PLAN - 1

Case No. 2:17-cv-01341-RSL

1 *Waiver of Service, Dkt. # 11.* Accordingly, Defendant's answer is not due until sixty days have
2 elapsed after the waiver was sent, or here, November 7, 2017. FRCP 4(d)(3). Both the
3 Plaintiff's claims as well as affirmative defenses raised by the Defendant should be considered
4 in formulating a complete final joint status report and discovery plan. An extension would
5 enable the parties to formulate a complete joint status report and discovery plan.

6 For the reasons stated above, the parties stipulate and jointly move the Court to
7 extend the deadline for initial disclosures to be exchanged pursuant to FRCP 26(a)(1) on
8 November 16, 2017 and that the parties file the joint status report and discovery plan on
9 November 16, 2017.

10 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

11 REED LONGYEAR MALNATI & AHRENS, PLLC

12 s/Elizabeth A. Hanley October 23, 2017
13 Elizabeth A. Hanley, WSBA # 38233 Dated
14 Reed Longyear Malnati & Ahrens, PLLC
15 801 Second Ave., Ste. 1415
16 Seattle, WA 98104
17 Tel. (206) 624-6271, Fax (206) 624-6672
18 Email: ehanley@reedlongyearlaw.com
19 Attorney for Plaintiff

20 KIOVSKY DUWALDT, LLC

21 s/Elizabeth I. Kiovsky October 23, 2017
22 Elizabeth I. Kiovsky Dated
23 Kiovsky Duwaldt, LLC
24 2820 Welton St.
25 Denver, CO 80205
26 Tel. (303) 320-8301
27 Fax (866) 804-9379
28 Email: beth@kdemploymentlaw.com
29 Attorneys for Defendant

30 JOINT STIPULATED MOTION FOR RELIEF FROM DEADLINE FOR
31 INITIAL DISCLOSURES AND JOINT STATUS REPORT AND
32 DISCOVERY PLAN - 2

33 Case No. 2:17-cv-01341-RSL



34 801 Second Avenue, Suite 1415
35 Seattle, Washington 98104-1517
36 (206) 624-6271

1
LAW OFFICES OF THOMAS J. OWENS
2

3 s/Thomas J. Owens

October 23, 2017

4 Thomas J. Owens
5 Law Offices of Thomas J. Owens
6 1001 Fourth Avenue, Suite 4400
7 Seattle, WA 98154
8 Tel. (206) 250-0413
9 Fax (206) 389-1708
Attorney for Defendant

Dated

10 IT IS SO ORDERED.
11
12 DATED: Oct. 24, 2017 
13
14
15
16
17
18
19
20
21
22
23

The Honorable Robert S. Lasnik
United States District Court
Western District of Washington

24 JOINT STIPULATED MOTION FOR RELIEF FROM DEADLINE FOR
INITIAL DISCLOSURES AND JOINT STATUS REPORT AND
DISCOVERY PLAN - 3

Case No. 2:17-cv-01341-RSL